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PROPOSED ATTORNEYS KRISU HOSPITALITY, LLC
DEBTOR AND DEBTOR IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

| | | |
|--------------------------|---|-------------------|
| IN RE: | § | |
| | § | Case No. 19-20347 |
| KRISU HOSPITALITY, LLC , | § | (Chapter 11) |
| | § | |
| Debtor. | § | |
| | § | |

MOTION FOR EXPEDITED HEARING REGARDING FIRST DAY MOTIONS

TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:

Krisu Hospitality, LLC, debtor and debtor in possession ("Krisu" or the "Debtor") file this *Motion for Expedited Hearing* regarding the first day motions referenced and described herein, and in support thereof would show to the Court the following.

1. On November 6 , 2019, Krisu filed the following Motions (collectively, the "First Day Motions") for which Krisu seeks an expedited hearing.
 - a. Debtor's Application for Employment of Attorney
 - b. Motion to Use Cash Collateral
 - c. Motion to Obtain Bank Accounts
 - d. Motion to Pay Pre-Petition Wages
 - e. Motion to Extend Time for Filing Certain Lists, Schedules and Statements

2. Requested hearing date and objection deadline: The Debtors respectfully request that the Court set an expedited hearing on November 12, 2019.

3. Reason for expedited hearing: An expedited hearing is necessary so that the Debtor may use cash collateral to pay ordinary expenses, including pay pre-petition wages as set forth in the First Day Motions.

4. Krisu is scheduled to make its next payroll on November 12, 2019.

5. Notice is sufficient. Setting an expedited hearing provides sufficient notice due to the prior order entered in this case and in light of the nature of the relief requested.

6. Reason hearing not requested sooner. A hearing was requested as soon as Krisu commenced the above-captioned case.

WHEREFORE, Krisu Hospitality, LLC, debtor and debtor in possession respectfully requests that Court set an expedited hearing on **November 12, 2019**. The Debtor respectfully requests such other and further relief to which the Debtor is entitled at law or in equity.

Dated: November 6, 2019

Respectfully submitted:

SWINDELL LAW FIRM

By: /s/ Patrick A. Swindell

Patrick A. Swindell

State Bar No. 19587450

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POSSESSION

CERTIFICATE OF SERVICE

A separate Certificate of Service will be filed.

/s/ Patrick A. Swindell

Patrick A. Swindell